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AND

CLARK COUNTY SCHOOL DISTRICT
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Attorneys for DEFENDANTS
Clark County School District and Board of
Trustees of the Clark County School District

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SARA QUINTANA,

Plaintiff,

vs.

CLARK COUNTY SCHOOL DISTRICT, a
 political subdivision of the State of Nevada;
 and the BOARD OF TRUSTEES OF THE
 CLARK COUNTY SCHOOL DISTRICT,
 in their official capacities,

Defendants.

CASE NO. 2:21-cv-00023-CDS-MDC

**STIPULATION AND ORDER
 TO EXTEND JOINT PRETRIAL
 ORDER DEADLINE TO 60 DAYS
 AFTER SETTLEMENT
 CONFERENCE**

(SECOND REQUEST)

IT IS HEREBY STIPULATED AND AGREED by Defendants CLARK COUNTY
 SCHOOL DISTRICT (CCSD) and the BOARD OF TRUSTEES OF THE CLARK COUNTY

SCHOOL DISTRICT (BOT) through their attorneys STEPHANIE A. BARKER, ESQ. of the law firm of OLSON CANNON & GORMLEY, and CRYSTAL J. PUGH, ESQ. of the OFFICE OF THE GENERAL COUNSEL FOR THE CLARK COUNTY SCHOOL DISTRICT; and by Plaintiff SARA QUINTANA through her attorneys JAMES P. KEMP, ESQ. of the law firm KEMP & KEMP, and JAMES A. HILL, ESQ. of the law firm GILBERT EMPLOYMENT LAW, P.C., that:

IN CONSIDERATION OF THE FOLLOWING:

1. On February 21, 2024, pursuant to the Court's Order (ECF 62) Granting in Part and Denying in Part Defendants' Motion for Summary Judgment, pursuant to LR 16-5 this case was referred to the Magistrate Judge for a settlement conference. The Order also directed that if the case did not settle, the parties must file their joint pretrial order 30 days after the conclusion of the settlement conference. ECF 62, p. 23.
2. A settlement conference was originally scheduled for June 18, 2024 (ECF 63) but did not proceed following Magistrate Judge Koppe's recusal on June 13, 2024 (ECF 64). Following reassignment to Magistrate Judge Albregts and resetting of the settlement conference to July 19, 2024 (ECF 65), a single extension of time was granted to accommodate Plaintiff's counsels' schedules and the settlement conference was re-scheduled for and held on November 4, 2024. (ECF 83.)
3. The settlement conference was not successful. (Minute Order November 4, 2024).
4. In light of the Court's Order (ECF 62) on Defendants' Motion for Summary Judgment, the parties have significantly differing views regarding how trial should proceed and the length of time necessary to complete the trial, which differences will require significant discussion between the parties in compliance with LR 16-3(b) in order to come to agreement on a Joint Pretrial Order.
5. Defense counsel Stephanie A. Barker, Esq., was out of the office and out of the country on a pre-scheduled vacation between November 22 and December 11, 2024.
6. In light of defense counsel's schedule, and scheduling conflicts created by the upcoming holiday season, the parties entered into a First Stipulation To Extend Joint

1 Pretrial Order Deadline to January 3, 2025 – 60 days after the Settlement Conference.
2 (ECF 72, filed on November 20, 2024.)

- 3 7. On November 21, 2022, the court entered an Order Granting the [First] Stipulation to
4 Extend Joint Pretrial Order Deadline to January 3, 2025. (ECF 73.)
- 5 8. On December 18, 2024, approximately one week after defense counsel returned to her
6 office, defense counsel sent correspondence to Plaintiff's counsel confirming efforts
7 to schedule a meet and confer conference regarding the Joint Pretrial Order, and
8 outlining nine initially identified potential Motion in Limine topics for discussion.
- 9 9. Subsequently, a first telephonic conference was scheduled between counsel for Friday,
10 December 20, 2024. At that time one of Plaintiff's trial attorneys was unable to attend
11 the conference due to a personal emergency. The conference was re-scheduled for
12 Monday, December 23, 2024.
- 13 10. On Monday, December 23, 2024, the parties held their first telephonic meet and confer
14 conference regarding the Joint Pretrial Order. Therein the parties discussed their
15 differing views of the remaining legal and factual issues for trial, and the potential
16 scope of the evidence as related to each party's view. Counsel agreed that a draft Joint
17 Pretrial Order would assist the parties' efforts to define the remaining legal and factual
18 issues. Accordingly, counsel for Plaintiff agreed to provide a proposed draft of the
19 Joint Pretrial Order to defense counsel on or before Friday, December 27, 2024.
- 20 11. A subsequent telephonic meet and confer has been scheduled for January 2, 2025.
- 21 12. Plaintiff has disclosed approximately 350 documents and recordings, consisting of
22 over 780 Bates numbered pages. Defendants have disclosed approximately 46
23 documents consisting of over 1,500 Bates numbered pages. The disclosure record is
24 extensive and will take additional time to adequately review in preparation of the Joint
25 Pretrial Order.
- 26 13. The parties, therefore, request the current January 3, 2025 due date for submission of
27 the Joint Pretrial Order be extended an additional two weeks to Friday, January 17,
28 2025, to allow adequate time for the parties to discuss and attempt to resolve disputes

1 they may have regarding the scope of the evidence to be presented at trial, following
2 consideration of the detail proposed in a draft Joint Pretrial Order, as well as the
3 evidentiary topics identified in defense counsel's correspondence of December 18,
4 2024.

5 14. This is the parties' second Stipulation to Extend the Joint Pretrial Order deadline. It
6 is not submitted for the purpose of delay, but rather is submitted in a good faith effort
7 to narrow and define the scope of the issues to be presented at trial.

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NOW THEREFORE, THE PARTIES HEREBY STIPULATE that the deadline to file the Joint Pretrial Order be extended for an additional two weeks to January 17, 2025.

RESPECTFULLY SUBMITTED.

DATED this 24th day of Dec., 2024.

KEMP & KEMP

/s/ James P. Kemp

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Attorneys for Plaintiff
Sara Quintana

DATED this 24th day of Dec., 2024.

OLSON CANNON & GORMLEY

/s/ Stephanie A. Barker

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Attorneys for Defendants
Clark County School District and Board of
Trustees of the Clark County School District

IT IS SO ORDERED.

DATED: 12/30/24


~~UNITED STATES DISTRICT COURT JUDGE~~
United States Magistrate Judge

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